



July 25, 1995

Ms. Jeanne Griffin
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard (HSM-5J)
Chicago, IL 60604

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SITE ASSESSMENT SECTION

**Subject: General Motors Corporation - Fisher Body Division
Elyria, Lorain County, Ohio
EPA ID No. OHD 004 201 091
Focused Site Inspection Prioritization
Work Assignment No. 35-5JZZ
Contract No. 68-W8-0084**

Dear Ms. Griffin:

Under the above-referenced work assignment, PRC Environmental Management, Inc. (PRC), began conducting focused site inspection prioritization (FSIP) activities for the General Motors Corporation - Fisher Body Division (GMC-Fisher) site in Elyria, Ohio. The purpose of the FSIP work assignment is to assist the U.S. Environmental Protection Agency (EPA) in updating site inspections (SI) performed before the current Hazard Ranking System (HRS) was implemented in December 1990. As part of the FSIP for the GMC-Fisher site, PRC reviewed available file information to determine whether the site is regulated under the Resource Conservation and Recovery Act (RCRA) and is thus not eligible for the National Priorities List (NPL). Based on its review of available file information, PRC has determined that the GMC-Fisher site is regulated under RCRA. Therefore, the site is not eligible for the NPL.

This letter report documents PRC's findings. It provides a brief description of the site and its location, a summary of the site's regulatory history, and PRC's conclusions regarding the site. References used to prepare this letter report are listed at the end of the letter. The site's location in relation to surrounding topographic features is shown in the site location map, which is provided in Enclosure 1. The EPA recommendation form for the site is provided in Enclosure 2.

SITE LOCATION AND DESCRIPTION

The GMC-Fisher site contains an inactive manufacturing plant and is located in a rural area at 1400 Lowell Street in Elyria, Lorain County, Ohio (latitude 41°22'10" N; longitude 82°08'20" W) (E&E 1991). According to the screening site inspection (SSI) report for the site prepared by Ecology and Environment, Inc. (E&E), the EPA Field Investigation Team (FIT) (see Regulatory History below), GMC-Fisher operated on 226 acres divided into the following two parcels of land:
(1) Parcel B, consisting of the 85-acre "site," and (2) the remaining 141-acre Parcel A. In the site files

Ms. Jeanne Griffin
July 25, 1995
Page 2

reviewed, PRC found no other documents that restrict the definition of the "site" to Parcel B. Therefore, for the purposes of this letter, the term "site" is used to refer to the entire 226-acre area encompassing both Parcels A and B; however, the two parcels are discussed separately in descriptions of activities that exclusively took place on either of the parcels.

In 1946, General Motors Corporation (GMC) built a manufacturing plant on Parcel A of the site. The plant began manufacturing parts for the automotive industry in 1952. These parts included auto grills, wheel covers, die-casted parts, and instrument panels. Electroplating was a major component of the plant's manufacturing processes. Beginning in 1984, the plant began manufacturing products such as seat cushions, metal seat frames, sun roof assemblies, and exterior and interior trim items. GMC-Fisher operated a wastewater treatment plant (WWTP) located on Parcel A and used primarily to treat electroplating wastewater. Before the 1970s, WWTP sludges containing cadmium, chromium, nickel, and cyanide (later classified as F006 hazardous wastes) were settled out in thickening tanks and removed for off-site disposal. Beginning in the early 1970s, WWTP sludges were placed in three 200-by 500-foot settling basins located on Parcel B. These unlined settling basins operated as surface impoundments and had a total capacity of about 40,000 cubic yards (yd³). In July 1984, GMC-Fisher discontinued most of its electroplating operations, reducing the sludge loading of its WWTP. GMC-Fisher then incorporated a filter press for sludge dewatering, thus eliminating the need for the surface impoundments (E&E 1991).

The GMC-Fisher plant ceased operations in July 1988. In October 1989, GMC sold Parcel A to the Northern Ohio Industrial Park. According to available site file information, the plant building located on Parcel A is being used for office space, and GMC still owns Parcel B (E&E 1991).

REGULATORY HISTORY

To date, the regulatory history of the site has included both RCRA and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) activities. These activities are summarized below.

RCRA Activity

GMC-Fisher operated as a RCRA interim status treatment, storage, or disposal (TSD) facility for hazardous wastes. In November 1980, GMC-Fisher submitted a RCRA Part A permit application (Part A) as a TSD facility. The Part A identified the following process codes: tank treatment (T01), surface impoundment treatment (T02), other treatment (T04), container storage (S01), tank storage (S02), and surface impoundment storage (S04). The EPA identification number listed on the Part A is OHD 990 778 860 (GMC-Fisher 1980). However, subsequent RCRA correspondence in the site files reviewed by PRC lists GMC-Fisher's EPA identification number as OHD 004 201 091. The reason for the existence of two different EPA identification numbers was not apparent in the site files reviewed by PRC.

In 1985, GMC-Fisher submitted a Part B permit application (Part B). However, with this submittal, GMC-Fisher expressed its intent to pursue closure of its TSD units and consequently withdraw its Part B (GMC-Fisher 1985). In April 1987, EPA approved GMC-Fisher's RCRA closure plan for

indoor and outdoor, hazardous waste drum storage areas and toluene diisocyanate storage tanks. In August 1987, the Ohio Environmental Protection Agency (OEPA) approved GMC-Fisher's closure plan for three hazardous waste surface impoundments (the WWTP settling basins). OEPA approved RCRA closure of these units in January 1993 (OEPA 1993). As part of RCRA closure activities, GMC-Fisher stabilized sludge from the three surface impoundments with cement kiln dust and disposed of the stabilized sludge in a hazardous waste landfill at the former location of two of the surface impoundments (OEPA 1990). Therefore, GMC-Fisher maintains the status of a RCRA land disposal facility subject to postclosure care requirements (OEPA 1993). Under this status, GMC-Fisher submitted a Part A in July 1989 that included only the process code for landfill disposal (D80). This Part A was submitted for Parcel B, which contains the closed hazardous waste disposal unit (GMC-Fisher 1989). GMC-Fisher also submitted a postclosure care plan for this land disposal unit (GMC-Fisher 1992). The current status of postclosure care activities was not evident from the site files reviewed by PRC.

In February 1986, GMC-Fisher submitted to OEPA a certification regarding potential releases from solid waste management units (SWMU). This certification identified three past disposal areas, A, B, and C, used for open burning of plant trash, WWTP sludge drying, and burial of dried WWTP sludge, respectively. Disposal areas A and B and disposal area C were located northeast and east of the former WWTP settling basins, respectively (OEPA 1987). Additionally, according to the "RCRA TSD Facilities Corrective Action Prioritization," the GMC-Fisher facility is eligible and was prioritized for RCRA corrective action. Under RCRA corrective action requirements, EPA conducted a visual site inspection at the GMC-Fisher site in 1986 to identify SWMUs and evaluate the potential for release and the need for corrective action associated with these units (PRC 1994).

CERCLA Activity

In June 1981, GMC-Fisher submitted an EPA Notification of Hazardous Waste Site Form for 20 acres of landfill area. Buried drums were also identified on the form. Wastes specified on the form included inorganics, heavy metals, and bases generated from plating and polishing activities (GMC-Fisher 1981). According to the SSI report, the 20 acres of landfill area identified on the notification form referred to disposal areas A, B, and C (E&E 1991).

In March 1984, OEPA conducted a CERCLA potential hazardous waste site preliminary assessment (PA) at the site. Based on the PA findings, OEPA recommended that a low priority for field investigation be assigned to the site. In June 1984, the PA was revised to recommend the site a medium priority for site inspection; OEPA stated that this recommendation may change depending on the installation of additional monitoring wells at the site and information supplied to OEPA concerning past GMC-Fisher disposal practices (OEPA 1984).

In 1990, E&E, the EPA FIT contractor, conducted an SSI at the GMC-Fisher site. The 1990 SSI included a site reconnaissance and collection of seven soil samples. The on-site soil samples were collected at disposal areas A, B, and C on Parcel B of the site. Analysis of soil samples revealed elevated concentrations of several contaminants, including Aroclor 1254, chromium, nickel, and zinc (E&E 1991). No information regarding additional CERCLA activities at the GMC-Fisher site was available in the site files reviewed by PRC.

CONCLUSIONS

Based on the information discussed above, the GMC-Fisher site is apparently regulated under RCRA; therefore, the site is not eligible for the NPL. At this time, PRC concludes that any GMC-Fisher site contamination should be addressed under RCRA authority. Any GMC-Fisher site contamination would be most appropriately addressed under either the Hazardous and Solid Waste Amendments of 1984, which pertain to corrective action for all releases of hazardous waste or hazardous waste constituents from any SWMU regardless of when waste was placed in the unit, or RCRA postclosure care requirements.

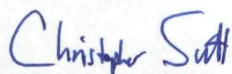
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- GMC-Fisher. 1989. Part A Permit Application. July 5.
- GMC-Fisher. 1992. Letter regarding GMC-Fisher Postclosure Care Plan. From Kathleen Nicholson. To Director, OEPA. October 29.
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Ms. Jeanne Griffin
July 25, 1995
Page 5

If you have any questions or comments regarding this letter report, please contact Jack Brunner or me at (312) 856-8700.

Sincerely,

A handwritten signature in blue ink that reads "Christopher Scott". The signature is written in a cursive, slightly slanted style.

Christopher Scott
Project Manager

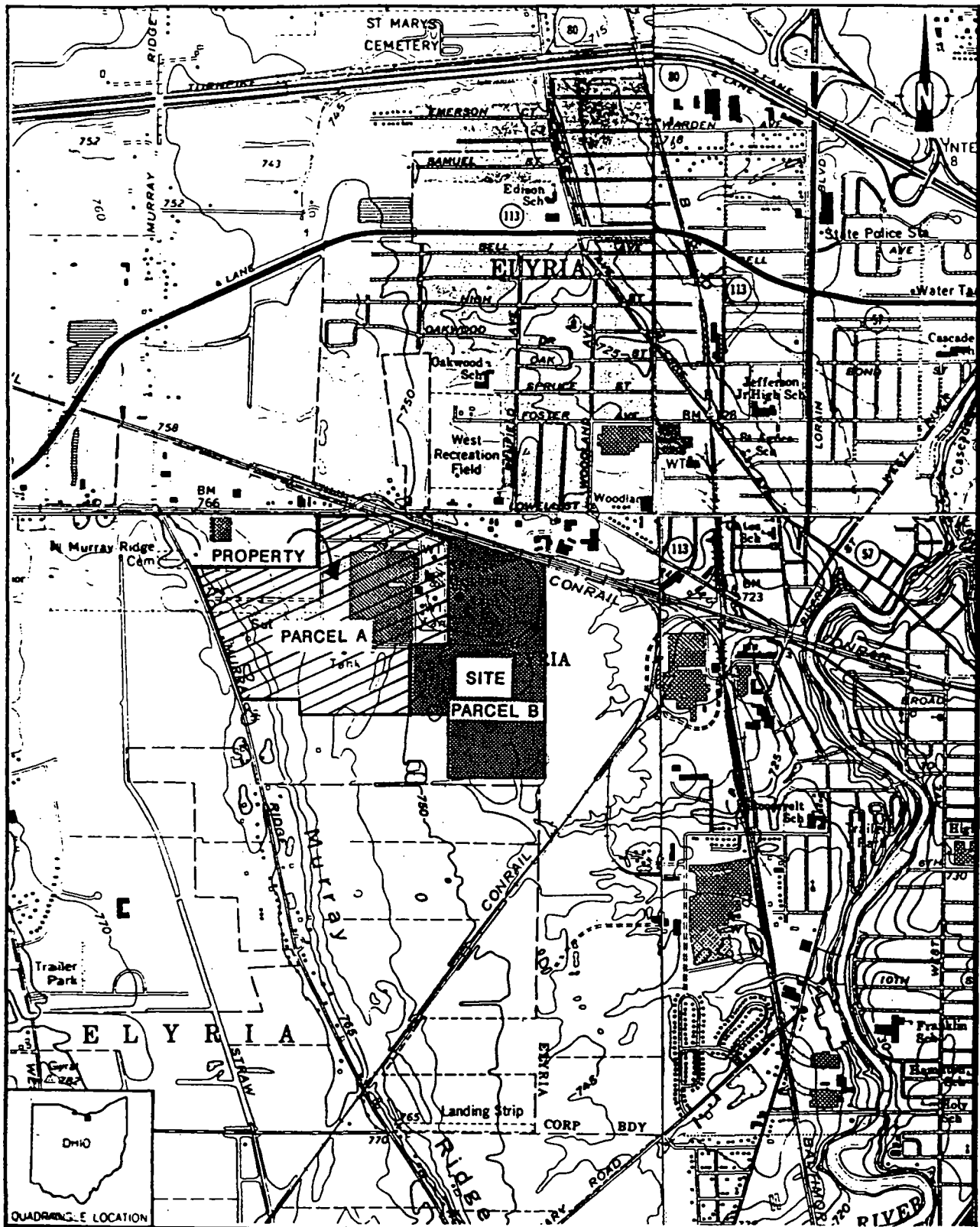
Enclosures (2)

cc: Thomas Short, EPA Project Officer
Brigitte Manzke, EPA Contracting Officer
Julie Corkran, OEPA Northeast District Office
Majid Chaudhry, PRC ARCS Program Manager
Jack Brunner, PRC

ENCLOSURE 1

SITE LOCATION MAP
[Reproduced from E&E 1991]

(One Page)



SOURCE: USGS, Lorain, OH Quadrangle, 7.5 Minute Series, 1969, photorevised 1979; Oberlin, OH Quadrangle, 7.5 Minute Series, 1969, photorevised 1979; Avon, OH Quadrangle, 7.5 Minute Series, 1963, photorevised 1979; Grafton, OH Quadrangle, 7.5 Minute Series, 1963, photorevised 1979.

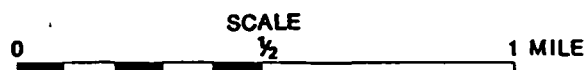


FIGURE 2-1 SITE LOCATION